As 3, 8, 9, 13 and 14 unsealed per Mag. Judge Webster at 3:41 p.m. on 8/9/18

# SEALED

IN THE UNITED STATES DISTRICT COURT

FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

FILED IN THIS OFFICE JUL 31 2018 Clerk U.S. District Court Greensboro, NC BY ____

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| UNITED STATES OF AMERICA | : | |
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| v. | : | |
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| | : | 1:18CR 303 -1 |
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| | : | 1:18CR 303 -2 |
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| SALVADOR VALADEZ, JR. | : | 1:18CR 303 -3 |
| | : | 1:18CR 303 -4 |
| | : | 1:18CR 303 -5 |
| | : | 1:18CR 303 -6 |
| | : | 1:18CR 303 -7 |
| CHARLES STANLEY BANGERT, JR. | : | 1:18CR 303 -8 |
| ASHLEY DAWN SANDERS | : | 1:18CR 303 -9 |
| | : | 1:18CR 303 -10 |
| | : | 1:18CR 303 -11 |
| | : | 1:18CR 303 -12 |
| ASHLEY PAIGE KRAMER | : | 1:18CR 303 -13 |
| JACOB DANIEL JOHNSON | : | 1:18CR 303 -14 |
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| | : | 1:18CR 303 -28 |

The Grand Jury charges:

COUNT ONE

From on or about January 1, 2014, continuing up to and including on or about February 17, 2017, the exact dates to the Grand Jurors unknown, in the County of Rowan, in the Middle District of North Carolina, and elsewhere,

SALVADOR VALADEZ, JR.,

CHARLES STANLEY BANGERT, JR., ASHLEY DAWN SANDERS,

ASHLEY PAIGE KRAMER, JACOB DANIEL JOHNSON,

and divers other persons, known and unknown to the Grand Jurors, knowingly and intentionally did unlawfully conspire, combine, confederate, and agree together and with each other to commit offenses against the laws of the United States, that is:

1. To knowingly, intentionally, and unlawfully distribute a quantity of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance within the meaning of Title 21, United States Code, Section 812, in violation of Title 21, United States Code, Section 841(a)(1);

2. To knowingly, intentionally and unlawfully manufacture a quantity of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance within the meaning of Title 21, United States Code, Section 812, in violation of Title 21, United States Code, Section 841(a)(1);

3. To knowingly, intentionally, and unlawfully possess pseudophedrine, a list I chemical, knowing and having reasonable cause to believe that it would be used to manufacture methamphetamine, a Schedule II controlled substance, within the meaning of Title 21, United States Code, Section 812, in violation of Title 21, United States Code, Sections 802(34)(K) an 841(c)(2);

4. To knowingly, intentionally, and unlawfully possess equipment, chemicals, products, and materials which may be used in the manufacture of methamphetamine, a Schedule II controlled substance, within the meaning of

Title 21, United States Code, Section 812, knowing, intending, and having reasonable cause to believe that they will be used to manufacture methamphetamine, in violation of Title 21, United States Code, Section 843(a)(6); and

5. To knowingly, intentionally and unlawfully distribute a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance within the meaning of Title 21, United States Code, Section 841(a)(1).

Quantities of Controlled Substances Involved in the Conspiracy

With respect to SALVADOR VALDEZ, JR., the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 500 grams or more of methamphetamine.

With respect to CHARLES STANLEY BANGERT, JR., the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 50 grams or more of methamphetamine.

With respect to ASHLEY DAWN SANDERS, the amount involved in the conspiracy attributable to her as a result of her own conduct, and the conduct of other conspirators reasonably foreseeable to her, is 500 grams or more of methamphetamine.

With respect to ASHLEY PAIGE KRAMER, the amount involved in the conspiracy attributable to her as a result of her own conduct, and the conduct of other conspirators reasonably foreseeable to her, is 500 grams or more of methamphetamine.

With respect to JACOB DANIEL JOHNSON, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 500 grams or more of methamphetamine.

All in violation of Title 21, United States Code, Sections 846, 841(b)(1)(A), 841(b)(1)(B) and 841(b)(1)(C), 841(c)(2), and 843(d)(2).

COUNT TWO

COUNT THREE

From on or about November 24, 2016, continuing up to and including on or about September 30, 2017, the exact dates to the Grand Jurors unknown, in the County of Rowan, in the Middle District of North Carolina, and elsewhere,

SALVADOR VALADEZ, JR.,

and divers other persons, known and unknown to the Grand Jurors, knowingly and intentionally did unlawfully conspire, combine, confederate, and agree together and with each other to commit offenses against the laws of the United States, that is: knowingly, transport, transmit, and transfer funds from a place in the United States to and through a place outside the United States and to a place in the United States from or through a place outside the United States, with the intent to promote the carrying on of unlawful activity, to wit: conspiracy to distribute methamphetamine and heroin; in violation of Title 18, United States Code, Sections 1956(h) and 1956(a)(2)(A).

COUNT FOUR

COUNT FIVE

## COUNT SIX

## COUNT SEVEN

## COUNT EIGHT

COUNT NINE

COUNT TEN

On or about September 7, 2017, in the County of Rowan, in the Middle District of North Carolina, ASHLEY PAIGE KRAMER and JACOB DANIEL JOHNSON knowingly and intentionally did unlawfully possess with intent to distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance within the meaning of Title 21, United States Code, Section 812; in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT ELEVEN

COUNT TWELVE

COUNT THIRTEEN

On or about October 10, 2017, in the County of Rowan, in the Middle District of North Carolina, SALVADOR VALADEZ, JR., knowingly and intentionally did unlawfully distribute 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance within the meaning of Title 21, United States Code, Section 812; in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).

COUNT FOURTEEN

COUNT FIFTEEN

COUNT SIXTEEN

COUNT SEVENTEEN

COUNT EIGHTEEN

COUNT NINETEEN

COUNT TWENTY

On or about April 13, 2018, in the County of Rowan, in the Middle District of North Carolina, CHARLES STANLEY BANGERT, JR., knowingly and intentionally did unlawfully possess with intent to distribute 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance within the meaning of Title 21, United States Code, Section 812; in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).

COUNT TWENTY-ONE

On or about May 16, 2018, in the County of Rowan, in the Middle District of North Carolina, ASHLEY DAWN SANDERS

knowingly and intentionally did unlawfully possess with intent to distribute 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance within the meaning of Title 21, United States Code, Section 812; in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).

DATED: July 30, 2018

MATTHEW G.T. MARTIN
United States Attorney

BY: TERRY M. MEINECKE
Assistant United States Attorney

A TRUE BILL:

FOREPERSON